Non-responsive Non-responsive
Non-responsive

June 1, 1999

To: Robert S Boethling
Office of Pollution Prevention and Toxics
USEPA
401 M St., SW
Washington, DC 20460

Dear Mr. Boethling:

Your name was in an item on Persistent Bioaccumulative Toxic (PBT) Chemicals in the January 5th Federal Register: 64FR687-729. Tankcars of PBT liquid chemicals buried in a Landfill in a clay bluff on the edge of Lake Erie should interest you. Will you help get any remaining liquid pumped out of the tanks before it reaches Lake Erie?

A map[1] showing the location of the Landfill and a scale drawing[2] of it are enclosed. I did not help with burials, but I'm familiar with most of the waste buried there, because I was a research chemist for Diamond Alkali, Diamond Shamrock, and successor companies for 40 years, starting in 1952.

The Landfill is within Diamond Shamrock's former Painesville Works, an 1100 acre Superfund Site by Lake Erie. The Site is CERCLIS #OHD980611909, proposed 5/10/93. Ohio EPA is doing the Remedial Invesatigation/Feasibility Study. The Landfill is at the edge of a 40 foot clay bluff which drops to Lake Erie. Ohio EPA records show Diamond Alkali and Diamond Shamrock buried about 107,000 gallons of liquids in large tanks, a few thousand 55 gallon drums of solids and liquids, and hundreds of five gallon cans from 1963 to 1970.

In 1981, Diamond gave EPA 7 pages dated 1968, which said burials were restricted to research wastes and began in 1965, and 9 more pages which included commercial scale wastes, and said the burials began in 1963 and ended on 8/17/70. Two pages showing the liquids in large tanks[3] are enclosed with this letter; the liquids were mainly carbon tetrachloride, sulfur monochloride, and hexachloro-butadiene (HCBD). The HCBD was probably contaminated with hexachlorobenzene (HCB), as I will explain.

Diamond used to make tri- and tetra-chloroethylenes in Texas. The high boiling byproduct from this was 85-90% HCBD and most of the rest was HCB; it had no market. About 1960, the Pa. Salt Co. wanted all the HCBD Diamond could supply, at $0.50/lb. All the accumulated crude HCBD byproduct was shipped to Diamond's Semiworks in Ashtabula for distillation, but the order was cancelled before much was cleaned up. I believe this accounts for the five tankcars of HCBD Diamond reported burying on 11/4/64. Those tankcars were probably similar to a 10,000 gallon tankcar partly derailed on a short section of remaining track nearby. Photos of that tankcar are enclosed.

When Diamond's successor, Maxus Energy, (now owned by the Argentine oil and gas company, YPF) and Ohio EPA began misrepresenting the Landfill as containing just research wastes--typically less than five gallon packages, I began objecting, to no avail. Last year I Appealled Ohio EPA's handling of the Landfill, but my Appeal was dismissed as having been filed too late; page 1 of the Appeal (Case # EBR 433921) is enclosed. During "discovery", I found the enclosed ODNR letter to Ohio EPA (and the Woodward-Clyde remediation study cited in my note appended to that letter) in Ohio EPA's Northeastern District Office in Twinsburg. It supports my belief that most of the chlorinated liquids buried in large tanks (in glacial silt and clay) may still be recoverable.

Ohio EPA's 3/16/95 Questions and Answers about the Diamond Site said (p. 10), "A strong possibility exists that contaminants placed in the One-Acre Landfill and production area have migrated into Lake Erie." (The cover and pages 7-10 are enclosed.)

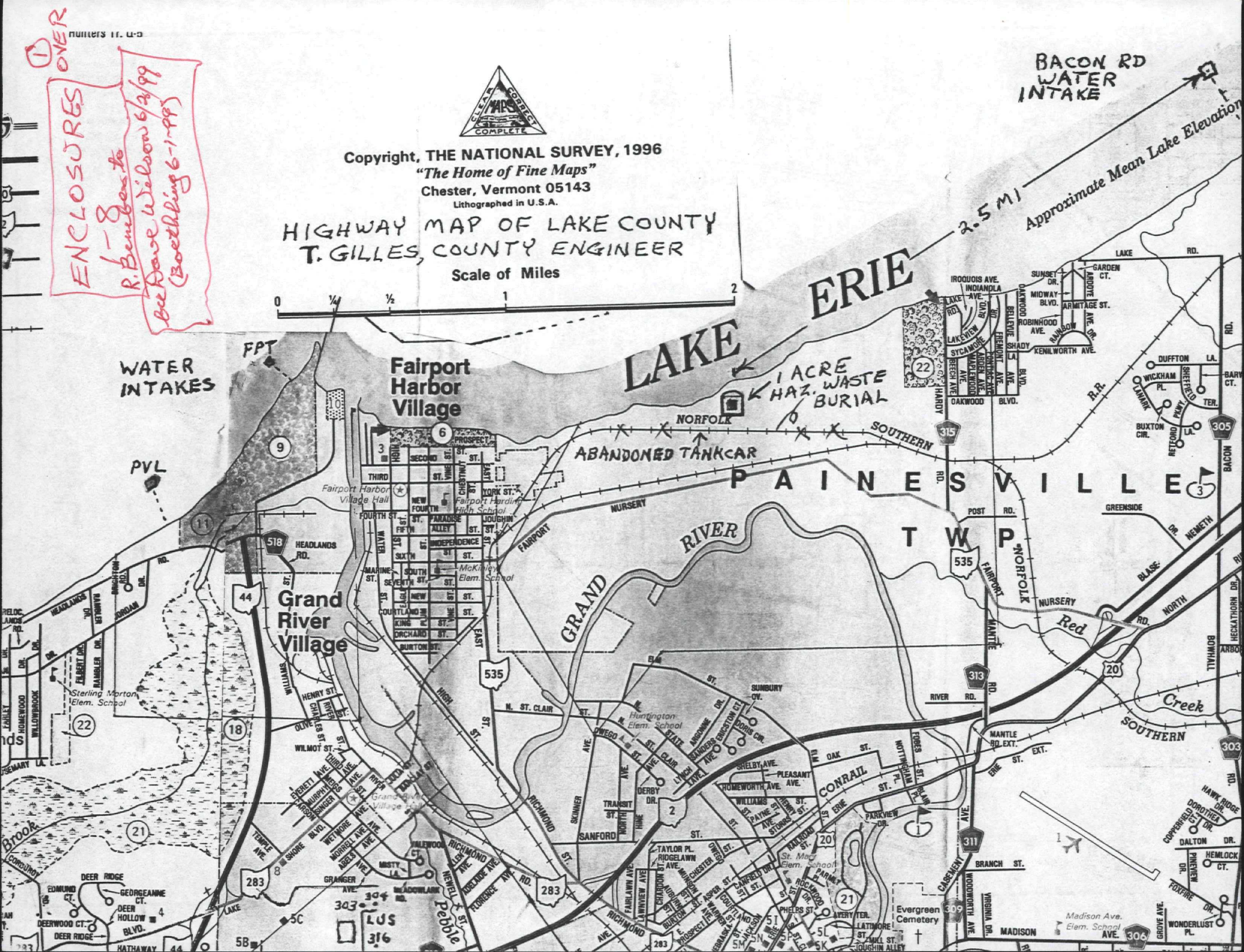
Also in March 1995, I measured alkaline (pH 8 to 10 or more) seepage to the Lake along most of the Site shoreline, but acidic (pH 5.5 and 5.7 on different days) seepage at the west end of the erosion barrier by the Landfill. (Pervasive alkaline seepage is to be expected because Diamond manufactured anhydrous sodium carbonate, "soda ash", here at up to 2400 tons per day from 1912 through 1976.) I reported my measurements of seepages to Ohio EPA. They won't tell me whether anyone has tested nearby Lake Erie water for possible pollution by chlorinated organics from this Landfill; they just say Maxus' tests of wells near the Landfill don't reveal any such pollution! But on June 1, 1995, a Maxus employee, Joe Phoenix, told me so much clay had infiltrated their wells that they kept raising their water sample intakes, and might be sampling above the burials! I relayed that to Ohio EPA's Site Investigator, Teri Phillips, a few minutes later.

A copy of the latest Diamond Shamrock Community Relations Team newsletter (July 1998) is enclosed. The Question & Answer at the end shows Ohio EPA doesn't seem to care that there are large tanks of toxic liquids in the landfill.

Current National Primary Drinking Water Regulations have a MCLG of zero and a MCL of 0.001 mg of HCB per liter of water on page 4 of 9 at http://www.epa.gov/ogwdw/wot/appa.html . HCBD is on the Contaminant Candidate List for possible regulation in drinking water soon, at 64FR23403 on 4/30/99. USEPA's final water quality guidance for the Great Lakes, at 60 FR 15366-15425, 3/23/95, listed both HCBD and HCB as Bioaccumulative Chemicals of Concern in Table 6 on page 15393. Our Great Lakes Water Quality Agreement with Canada requires us to minimize pollution of our boundary waters by such materials. Also, HCBD was # 19 of the Top 20 Hazardous Substances, ATSDR/EPA Priority List for 1997 at http://www.atsdr.cdc.gov.cxcx3.html .

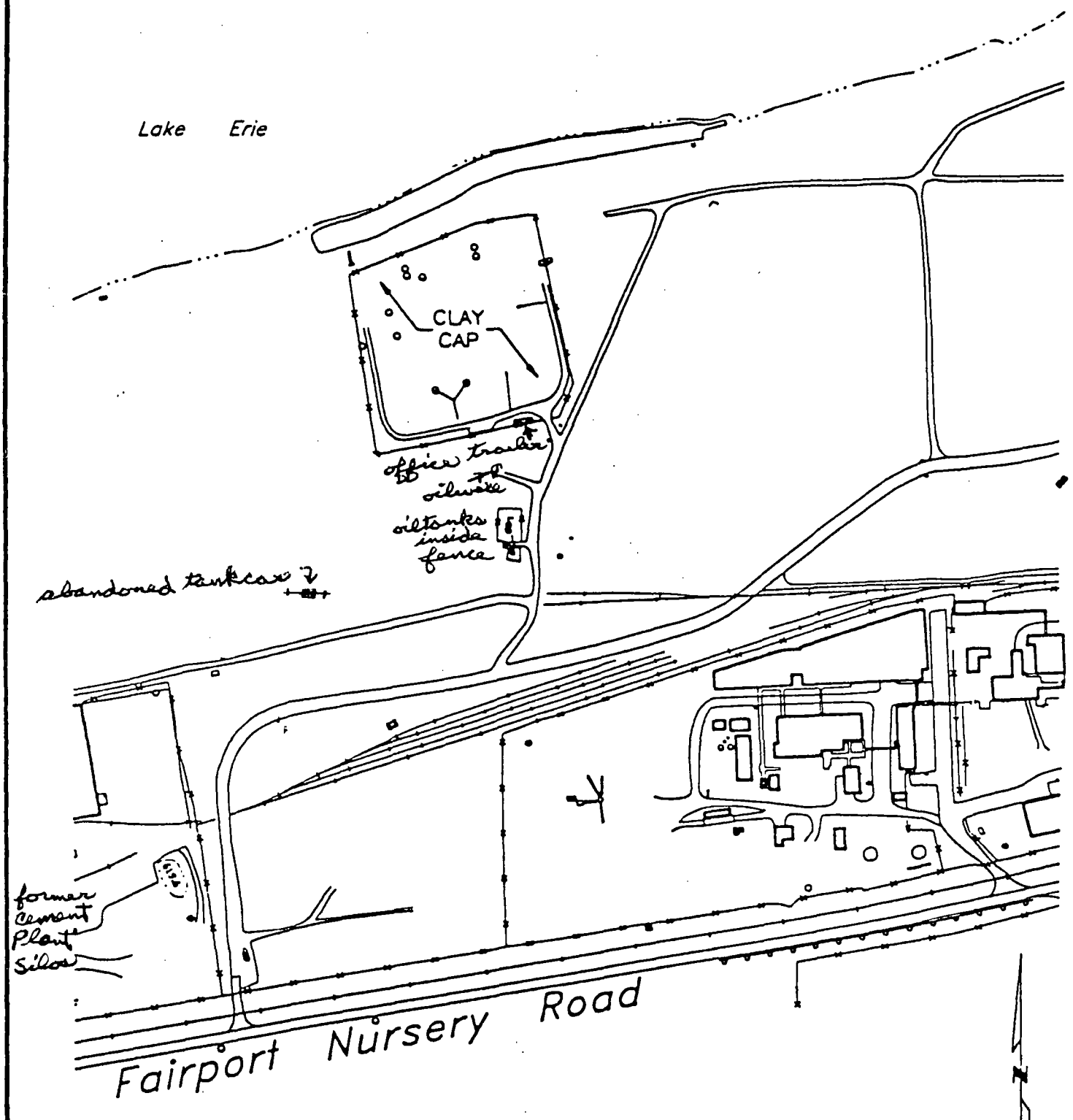
Sincerely,

Non-responsive


Copyright, THE NATIONAL SURVEY, 1996
"The Home of Fine Maps"
Chester, Vermont 05143
Lithographed in U.S.A.
CLEAR CORRECT COMPLETE
HIGHWAY MAP OF LAKE COUNTY
T. GILLES, COUNTY ENGINEER
Scale of Miles
0 ¼ ½ 1 2
ENCLOSURES 1-8
① OVER
R. Benedict to Dave Wilson 6/2/99
(Boething 6-1-99)
BACON RD WATER INTAKE
2.5 MI
Approximate Mean Lake Elevation
LAKE ERIE
1 ACRE HAZ. WASTE BURIAL
ABANDONED TANKCAR
WATER INTAKES
FPT
PVL
Fairport Harbor Village
Grand River Village
PAINESVILLE TWP
GRAND RIVER
NORFOLK SOUTHERN
CONRAIL
Red Creek
Evergreen Cemetery
Fairport Harbor Village Hall
Fairport Harding High School
McKinley Elem. School
Sterling Morton Elem. School
Huntington Elem. School
Grand River Village Hall
Madison Ave. Elem. School
HEADLANDS RD.
RICHMOND ST.
HIGH ST.
EAST ST.
MADISON AVE.
LUS 316
303 304

(2)

ONE–ACRE LANDFILL



ENSR™
ENSR CONSULTING AND ENGINEERING

(handwritten additions by R. Binder) (1993?)

4493-001\449333a

WASTE DISPOSAL

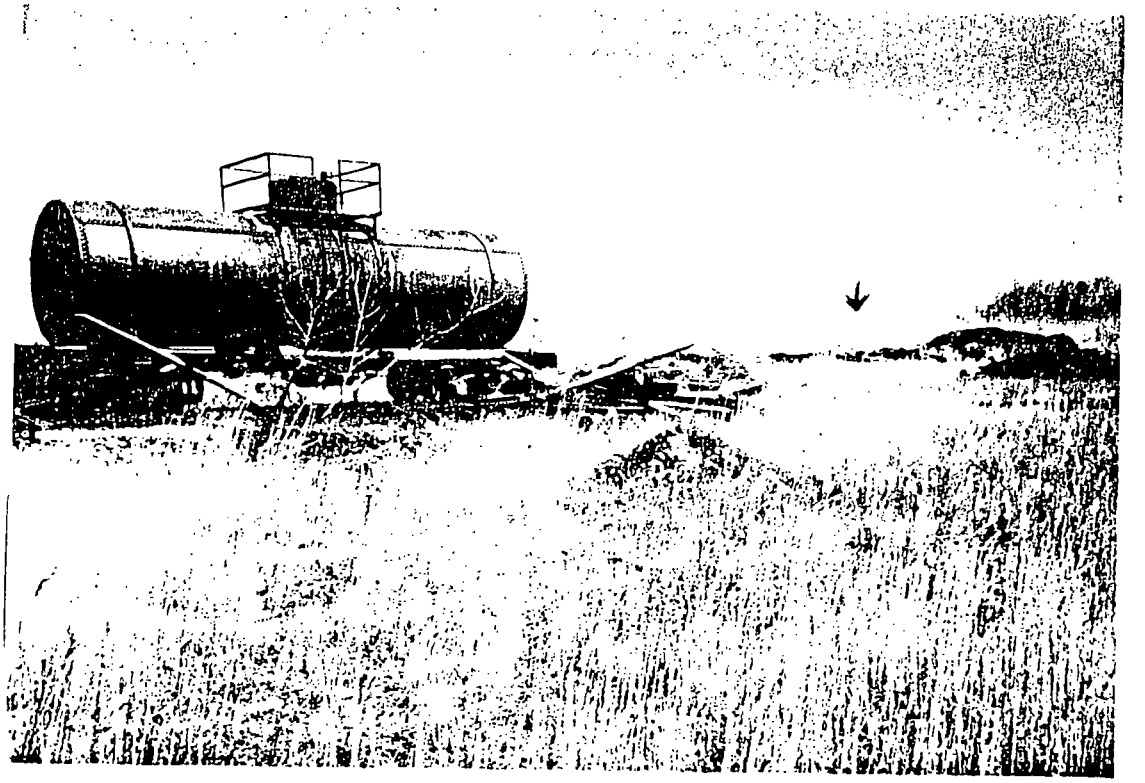
7/22/65	50#	Scrap PVF Resin
6/23/65	600#	Disodium Methane Arsenate
5/3/65	--	Month of April, no deliveries of waste material.
1/8/65	100#	Misc. small samples
1/14/65	100#	Polyacetyl waste
1/21/65	100#	Misc. small samples
1/28/65	450#	Misc. small samples
1/28/65	20#	Ethylene dichloride
1/28/65	50#	Polythi
1/28/65	50#	Methyl Methacrylate
1/28/65	20#	Dimethyl Formamide
2/4/65	75#	Misc. small samples
2/25/65	50#	p-1-0-1
2/25/65	250#	Diisocyanate waste
2/25/65	120#	Misc. samples
3/4/65	200#	Misc. samples
3/18/65	250#	Misc. samples
3/25/65	150#	Misc. samples
10/1/64	75#	Small samples
10/15/64	50#	Small samples
11/17/64	175#	Dimethyl Formamide
11/26/64	75#	Unreactive waste
12/--/64		Nothing to Coke Plant area.
12/22/64	8 Drums	Solid waste from the Dion Polysulfide Plant.
11/4/64	30 Drums	Hexachlorobutadiene
11/4/64	5 Cars	Hexachlorobutadiene
7/16/64	30#	Dichloro-p-Xylene
7/16/64	20#	Antimony Trioxide
8/20/64	500#	Hexachloro-p-Xylene
8/27/64	2500#	Hexachloro-p-Xylene
8/27/64	25#	Small samples
9/25/64	200#	Small samples
4/2/64	200#	Polyol samples
4/2/64	100#	Polymercaptan waste
4/2/64	100#	Broken glass
4/2/64	275#	Contaminated containers and trash.
4/7/64	750#	Polyol
4/7/64	95#	Small samples
4/7/64	200#	Contaminated container & trash.
4/9/64	90#	Drierite
4/9/64	25#	Polyol
4/9/64	100#	Contaminated trash
4/16/64	350#	Diisocyonate waste
4/16/64	2000#	Hexachloro-m-Xylene
4/16/64	500#	Diablo 700X
4/16/64	225#	Isophthaloyl Chloride
4/23/64	500#	Contaminated Transite
4/23/64	125#	Contaminated Trash
4/23/64	3000#	Polyol

3b

WASTE DISPOSAL

6/13/63	17 - 55 Gal. Drums		Hexachlorobenzene (HCB) & Hexachlorobutadiene (HCBD)
			580# to equal the Tons →
8/17/70	341 - 380#	Drums	CWX 500 (98.9 Tons)
"	117 - 525#	"	CWX 40 (30.7 ")
"	10 - 500#	"	CWX 40LV (2.5 ")
"	48 - 525#	"	ECCl (12.6 ")
"	In Process CCl_4 Materials		Crude -- 50% CCl_4, 50% S_2Cl_2 14,185 Gals.
"	" " " "		Settlings & residue -- 90% S_2Cl_2, 10% CCl_4 12,045 "
"	" " " "		Stripper Feed - 95% S_2Cl_2, 5% CCl_4 18,000 "
"	" " " "		Sulfur - several tons
"	" " " "		Still Toppings - 84% CCl_4 12,906 " 4.5% $CHCl_3$ 6.4% CS_2

Total 57,136 gal
× 14 lb/gal
799,904 lb



Both photos show a tankcar 500' from Diamond's hazardous chemical waste landfill and part of a white trailer on the fenced landfill. In 1997, about 4,000 gallons of liquid and sludge in the car was sampled for analysis.

ORIGINAL

(5)

AMENDED NOTICE OF APPEAL
BEFORE THE ENVIRONMENTAL REVIEW APPEALS COMMISSION

STATE OF OHIO

RUSSELL M. BIMBER
Non-responsive
Appellant

v.

DONALD SCHREGARDUS, DIRECTOR OF ENVIRONMENTAL PROTECTION
P. O. Box 1049
1800 Watermark Drive
Columbus, Ohio 43216

Appellee.

Case No. EBR 433921

AMENDED NOTICE OF APPEAL
WITH $40.00 FILING FEE
Mailed March 16, 1998

Notice is hereby given that Russell M. Bimber, Appellant, hereby appeals to the Environmental Review Appeals Commission, from the Ohio Environmental Protection Agency 9/27/95 Director's Final Findings and Orders (DFFO) for the Diamond Shamrock Painesville Works Site, which has led to an inadequate RI/FS which fails to consider the option of removing large volumes (107,000 gal?) of chlorinated solvent mixtures in large tanks (eg.,tankcars) as advised by federal guidance;* entered into this action on the 16th day of March, 1998, specifying objections of the manner in which Appellant is allegedly aggrieved and all relevant issues to be resolved by the Commission.

Russell M. Bimber
Appellant

Sworn To and subscribed in my presence this 16th day of March, 1998.

Charles E. Cannon

Non-responsive

Non-responsive

CHARLES E. CANNON
Attorney at Law
Notary Public, State of Ohio
My Commission Has no Expiration Date
Section 147.03 R.C.

Copies served same day by CERTIFIED MAIL, RETURN RECEIPT REQUESTED to:
ERAC- Original and five copies (one for time stamp & return)
Appellee-two copies (" " " " " ")
Teri Phillips, OEPA Site Investigator, 2110 East Aurora Road, Twinsburg, OH 44087- One copy
Office of the Attorney General, Environmental Enforcement Section 30 East Broad St., Columbus, OH 43215- One copy

****

Notary's seal affixed, in case this may be considered under ORC 3745.08 as a "Verified Complaint" that the Director has not truthfully reported, in the DFFO, the commercial scale amounts of chlorinated solvents that Diamond Shamrock reported burying in the "One Acre Landfill", and that the Director allowed a Landfill Cover to be installed without first removing those solvents, as appears to be required by federal guidance.*

****

originals only

* 40 CFR Ch 1, Section 300.430(iii)(A-D)

~~SKOHO~~
~~STEVE~~
FILE
R Becker
4-20-93
(6)

ODNR

Ohio Department of Natural Resources

DIVISION OF WATER
Fountain Square • Columbus, Ohio 43224 • (614) ~~466-4768~~ 265-6717

May 14, 1982

Mr. Charles Wilhelm, Chief
Div. of Hazardous Materials Management
Ohio Environmental Protection Agency
361 E. Broad St.
Columbus, OH 43215

RE: Diamond Shamrock Hazardous Waste Site, Lake County

Dear Mr. Wilhelm:

I am writing to call to your attention a one-acre hazardous waste site on the shoreline of Lake Erie, located close enough to the bluff to require erosion control measures. The Diamond Shamrock site is on the Lake County shoreline which has been experiencing severe erosion and shoreline recession. The historical rates for shoreline recession are 3 to 5 feet per year in this area, but with lake levels now higher than normal, the recession rates probably exceed this. The western corner of the landfill is approximately 50 feet from the bluff and the eastern corner is approximately 100 feet from the bluff. The problem, therefore, is a secure landfill containing hazardous materials located in a high risk erosion hazard area. For the short term, recently-installed erosion control structures may secure the area. For the long term, however, more permanent erosion control measures must be installed or materials in the landfill should be removed because of continual shoreline recession.

The Office of Chief Engineer in the Ohio Department of Natural Resources (ODNR) is the shore erosion agency for the State of Ohio, Chapter 1507 of the Revised Code. As such, this Office has expertise in the design and construction of shore erosion control measures. The Division of Geological Survey, ODNR, has conducted extensive research in Lake County on shore recession rates and erosion processes. Both offices would accept an invitation to visit the site and provide technical assistance relative to the erosion control measure at the site.

Concerning the recently-constructed erosion control measure, all structures built to control shoreline erosion along Lake Erie require a permit from the Office of Chief Engineer, ODNR (Section 1507.03 of the Revised Code). If the erosion control measure is constructed in the waters of Lake Erie, a lease must be obtained from the Ohio Department of Administrative Services, Section 123.031 of the Revised Code. If the structure involves the navigable waters of Lake Erie, a permit must be obtained from the Corps of Engineers, Section 10 of the River and Harbor Act and/or Section 404 of the Clean Water Act. Neither the Corps nor the Office of Chief Engineer has a permit application for the recently constructed erosion control measure, but we have brought the structures to their attention.

If I can be of further assistance to you on this matter, please contact me or Dick Bartz at (614) 265-6730.

Sincerely,

JOHN H. COUSINS
Chief

JHC/ww

cc: James Swartzmiller, Office of Chief Engineer, ODNR
Dr. Charles Carter, Division of Geological Survey, ODNR
Fred Mueller, Corps of Engineers
John Licata, Env. Mgr. Diamond Shamrock Corp.

----------added 9/23/98 by Russell Bimber----------

Remediation of the one acre site by landfill containment or removal of hazardous chemicals for commercial disposal was considered by Woodward-Clyde Consultants, in WCC File No 85C6322, for Diamond Shamrock Corp, of Dallas, TX, Oct 1986.

Containment would be relatively cheap, but removal was expected to yield 103,500 gallons of organic liquids needing to be incinerated, 2,700,000 gallons of contaminated water which would have to be cleaned up before release, or disposed through commercial waste management firms, and 1000 cubic yards of solid wastes or highly contaminated soil which would require incineration, and 39,600 cubic yards of less contaminated soil assumed acceptable for landfilling in a secure location, at a cost of $23,000,000.

Diamond proceeded quickly with the containment option, even though federal guidance advises removal of the chlorinated solvents in large tanks before containment (40 CFR Ch.1, part 300.430 (iii) (A)-(D)). I don't believe any governmental approval was sought or obtained before proceeding with containment.

I believe it may still be possible to pump out most of the 107,000 gallons of chlorinated solvent mixtures Diamond reported burying in large tanks, such as five tankcars (est. 10,000 gallons each, like an abandoned tankcar still in the middle of the former plant). This would cost much less than recovering a much larger volume of soil for incineration at a later date.

Russell Bimber

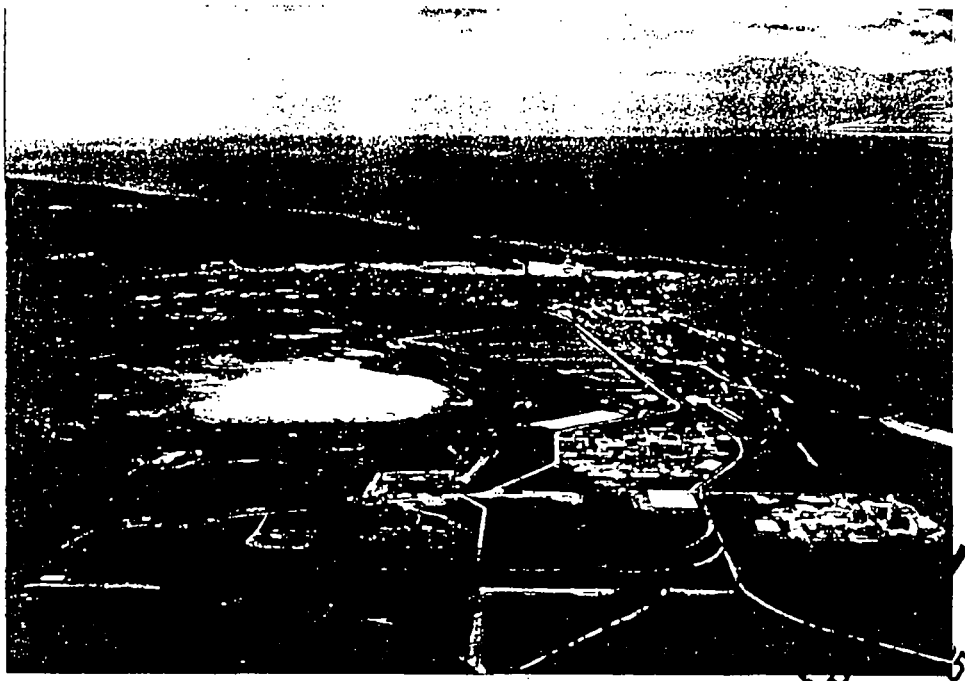
The shoreline erosion barrier was rebuilt ca 1986, then lengthened at both ends and eroded bluffs restored in 1998. - R. Bimber.

Questions and Answers

about the

Diamond Shamrock Painesville Works Site

Executive Summary



The Ohio Environmental Protection Agency
March 16, 1995

Milk of Lime Pond

- Waste deposited in this area included chromium, potassium dichromate, hexavalent chromium, sulfur dioxide, pickle liquor, and other wastes.

- This area was also covered over during the capping of Waste Lake #2 and the cap in this area also does not meet current Solid Waste standards for municipal landfills.

Grand River and Lake Erie

- Both bodies of water have received untreated wastes from the site directly through outfalls.

- These wastes included hexavalent chromium, as well as other toxic and/or hazardous wastes.

One-Acre Landfill

- Operated as a hazardous waste disposal area from 1963-1970.

- Was not constructed according to even current Solid Waste standards - **no liner exists under the wastes and the cap over the waste does not meet even municipal landfill requirements.**

- Contains research wastes from the Diamond Shamrock Fairport, Chardon, Ashtabula, and Concord Township research facilities.

- More than 900 drums and 5 railroad tank cars have been disposed of within the landfill.

- Many of the chemicals placed in the landfill are highly toxic and/or dangerous. These include, but are not limited to, the following:

CANCER-CAUSING CHEMICALS

PERCHLOROETHYLENE
CHROMIUM AND CHROME COMPOUNDS
HEXACHLOROBUTADIENE
HEXACHLOROBENZENE
DISODIUM METHANE ARSENATE
TRICHLOROPHENOL (can also turn into dioxin with addition of heat)

MUTAGENIC CHEMICALS (CAUSE BIOLOGICAL MUTATIONS):

TOLUENE
XYLENE
DIMETHYL FORMAMIDE

CHLORINE

TERATOGENIC CHEMICALS (CAUSE FETAL MALFORMATIONS):

DISODIUM METHANE ARSENATE
TRICHLOROBENZENE
TOLUENE

POISONOUS CHEMICALS

CYANATES (CYANIDE FUMES)
DISODIUM METHANE ARSENATE (ARSENIC FUMES)
ANTIMONY TRIOXIDE
PHOSPHORUS PENTOXIDE
ANILINE
TRICHLOROBENZENE
CHLORINE
MERCAPTANS (SULFUR FUMES)

FLAMMABLE/EXPLOSIVE CHEMICALS:

METHYL METHACRYLATE (spontaneous explosive)
TOLUENE
XYLENE
HEPTANE
ACETONE
POLYOL (SOLVENT)
WASTE SOLVENTS
METHYLENE CHLORIDE
DIMETHYL FORMAMIDE

- Waste was disposed of in trenches and covered over with soils.

- Leachate from the landfill is a hazardous waste under Ohio law.

- Shoreline erosion of Lake Erie continues to threaten the landfill.

  * Current figures from the Ohio Department of Natural Resources (ODNR) show that Lake Erie, in the vicinity of the landfill is eroding at a rate of almost **5 feet per year** (see Attachment D).

  * While anti-erosion measures taken by Maxus Energy have slowed shoreline erosion, it appears that erosion to the west of the established barrier is eating into the bank and natural progression will eventually lead to encroachment of Lake Erie onto the landfill.

* This area continues to be unstable geologically and **only approximately 50 feet remains between the landfill and Lake Erie** (see Attachment E).

EXPOSURE RISKS AND RELEASES

While it is the duty of the Ohio Department of Health (ODH), through an agreement with the Agency for Toxic Substances Disease Registry (ATSDR), to assess human health risks posed by the Diamond Shamrock site, the Ohio EPA does assess exposure and potential exposure when determining site priority.

On-site releases have occurred to **all** media -- soil, surface water, groundwater, and air. These releases place residents of the area and people working or playing on-site at risk. The following is a discussion of the risk these media pose:

Soil Releases:

- Soil samples collected from Waste Lake #2 prior to capping revealed concentrations of chromium of 16,900 ppm and 14.40 ppm lead.

- On 3/16/88, during ACO sampling, muddied green snow was found around monitoring wells, suggesting that purge water was not drummed as required by the ACO, but was disposed of on the surface - This purge water contained high levels of hexavalent chromium.

- A strong possibility exists that wastes buried within the One-Acre Landfill has been released to surrounding soils.

- A strong possibility exists that liquid wastes place into Waste Lakes were released into the surrounding soils.

- In 1984 Ohio EPA sampling documented a release of chrome-contaminated iron oxide filings and coke tar decanter sludge (K087) waste to soils on the former Erie Coke & Chemical property.

- Sampling performed by the Lake County Commissioners in January 1995 shows above levels on chromium in soils on their property.

- Due to unrestricted access to the majority of the site, both the local population and on-site workers are at risk for exposure to hazardous wastes.

Surface Water Releases:

- Grand River

  - Ohio Water Quality violations for hexavalent chromium have been continuously occurring in the Grand River, even after capping of Waste Lake #2 (See Attachment C).

  - Leaching of dissolved solids from Waste Lake #4 have also lead to Ohio Water Quality violations in the Grand River.

  - Hexavalent Chromium, chromium, cadmium, lead, bis(2-ethylhexyl) phthalate, arsenic, mercury and other chemicals which have been found on site have also been found in the sediments of the Grand River.

  - Chromium and Cadmium, both known site contaminants, have been found in Grand River fish adjacent to the site.

  - Because of the heavy recreational use of the Grand River for purposes including fishing and boating, the local population is at risk of exposure to site contaminants (See Attachment F).

  - In addition, because the Grand River drains into Lake Erie, site contaminants may enter Lake Erie via that route and could potentially contaminate the drinking supply for the surrounding area.

- Lake Erie

  - Limited work has been done regarding sediment analysis in Lake Erie in the vicinity of the Diamond Shamrock site, however it is known that Painesville Plant surface runoff did enter Lake Erie directly through an outfall and that this runoff most likely contained chromium as well as other site contaminants.

  - A strong possibility exists that contaminants placed in the One-Acre Landfill and production area have migrated into Lake Erie.

  - Due to the recreational use of Lake Erie, as well as its use as a water supply, the local population is at risk for exposure to on-site contaminants.

Groundwater Releases:

  - Samples collected during USEPA ACO sampling shows significant releases of hexavalent chromium to groundwater in the vicinity of Waste Lake #2 (see Attachment G).

- Samples collected in January 1995 by the Lake County Commissioners show that shallow groundwater contains contaminants which can be related to Diamond Shamrock site activities including: chromium, lead, arsenic, bis (2-ethylhexyl) phthalate, and toluene.

- A strong possibility exists that contamination has been released from the waste lakes, production area, and One-Acre Landfill into the groundwater. Groundwater in this area is connected to both Lake Erie and the Grand River.

- The local population, through both recreational activities in Lake Erie and the Grand River and through drinking water, are at risk for exposure to on-site contaminants.

Air Releases:

- The potential exists for a release of asbestos from uncapped waste lakes.

- The Ohio EPA has documented evidence of a release of potentially hazardous chemicals due to demolition activities performed on site by National GG Industries contractors.

- Both the local population and on-site workers and trespassers are at risk to exposure of contaminants via the air pathway.

TECHNICAL CONCLUSIONS

Significant on-site contamination exists both from Diamond Shamrock site activities and the activities of others. Risk of exposure to both the human population and the environment exists at this site. In order to identify and alleviate this risk, the Ohio EPA has chosen the most cost efficient method at its disposal, namely the issuance of administrative orders on consent to perform a Remedial Investigation and Feasibility Study.

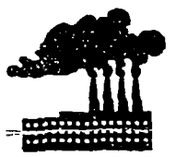
U.S. EPA HRS LISTING PACKAGE

U.S. EPA routinely performs preliminary assessments on sites that are listed on its "CERCLIS" listing (a list of known disposal sites nationwide), and goes on to complete HRS scoring packages for those sites that warrant such activity based on the initial examination. This Site very likely was continued through the process because documented releases to the environment of hazardous substances exist. Because Ohio EPA did not prepare the Hazard Ranking Scoring package, we do not feel that we can offer additional information on the listing package. However, it is clear to the Ohio EPA that this Site poses numerous risks that have not to date been fully identified or addressed.

Diamond Shamrock Community Relations Team

The Diamond Shamrock Community Relations Team is a responsive community team dedicated to communicating information and addressing public concerns regarding the investigation of the Diamond Shamrock Painesville Works Site.

Clean-up Timeline



Orders Signed (9/95)

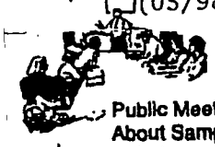
Public Meeting (11/95)

Work Plan Approved by Ohio EPA

Collect Samples

Results Reported to Ohio EPA

WE ARE HERE (05/98)



Public Meeting About Sample Results

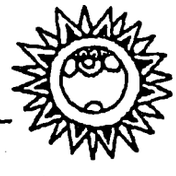
Researching Clean-up Methods

Clean-up Methods Recommended to Ohio EPA

Public Comments on Clean-up Methods

Ohio EPA Selects Clean-up Method

Orders Signed for Clean-up



Clean-up

Issue 3, July 1998

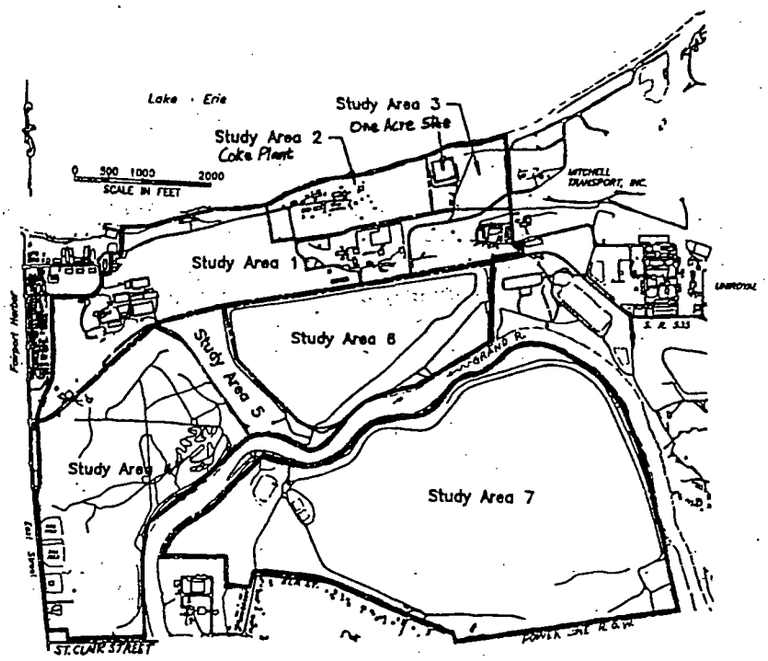
Diamond Shamrock Painesville Works Coke Plant History and Environmental Study

Diamond Shamrock started producing coke, a high quality solid fuel with industrial applications, at the Painesville Works in 1924. Coke was produced by heating coal in ovens to drive off the byproducts as gases. The resulting coke was used in the soda ash (sodium carbonate) manufacturing process and was also sold to foundries. The byproducts were recovered from the coke oven gases as cleaned coal gas which was burned for heating, tar which was refined into component hydrocarbons for sale, and ammonia which was used in the soda ash manufacturing process.

Diamond Shamrock sold the operating coke plant, including the forty acre land parcel on which it is located, to Erie Coke and Chemical Company (existing successor is Scepter Management Corporation) in 1976 when the rest of the Painesville Works shut down. They continued coke manufacturing operations until 1982 at a rate of about four hundred twenty five tons of coke per day. After Erie Coke and Chemical Company shut down the coke plant, they sold it to National GG Industries, leaving some hazardous waste on site. National GG intended to demolish existing plant structures. During National GG's initial demolition work in late 1987, however, open burning complaints were investigated by the Lake County General Health District and Ohio EPA. In addition, demolition work on a cooling tower resulted in a hazardous waste spill. Ohio EPA collected samples in early 1988 which showed the presence of hazardous waste constituents in the coke plant soil. Demolition work was halted, and the existing coke plant structures - buildings, tanks, pits, waste debris piles, etc. - remain onsite today. The coke plant's present owner is Ace Lakefront Properties.

Ohio EPA included the coke plant area in the ongoing environmental study (Remedial Investigation and Feasibility Study - RFIS). The Phase 1 environmental study work originally approved by Ohio EPA for the coke plant area required soil and groundwater samples, and also required samples of any material found in a large onsite tank and a railroad tank car.

Ohio EPA first asked coke plant owners/operators subsequent to Diamond Shamrock to conduct basic environmental study and clean up work at the site. Following discussions with Ohio EPA, those owners/operators did not undertake this work. Accordingly, Ohio EPA then requested the Painesville PRP Group to include additional work (the Interim Remedial Measures - IRM) in the environmental study plan previously approved by Ohio EPA. This additional IRM work included identifying and sampling any contents of all process vessels, tanks, debris piles and waste drums throughout the coke plant, identifying and blocking outfalls from the coke plant, as well as fencing off and posting the property to prevent injury to trespassers. The Painesville PRP Group agreed with Ohio EPA to undertake this additional work. All additional IRM work has been completed, as has the rest of the original Phase 1 environmental study work covering the coke plant and the rest of the site. The results of the coke plant sampling and analytical work were included with the report covering the rest of the Phase 1 environmental sampling and analytical work submitted to Ohio EPA on May 6, 1998.



Current Happenings

Uniroyal FUSRAP Clean-up:
Several citizens and members of the press have expressed interest in obtaining information regarding the Army Corps of Engineers/FUSRAP investigation and remediation of the Uniroyal property. This property is not a portion of the Diamond Shamrock Painesville Works Site and is therefore not involved with the Diamond Shamrock Community Relations Team. Further information regarding this site may be obtained from Nancy Zikmanis, Ohio EPA, (330)963-1160. Public documents regarding the Uniroyal site are temporarily located in the Diamond Shamrock Document Repository file cabinet in Morley Library.

Grand River Sediment/Surface Water Sampling:
The Ohio EPA will be performing sediment and surface water sampling in the Grand River this summer. Sediment sampling was performed during the week of May 25, 1998, and surface water sampling is scheduled for June and July. This work is being performed as part of the Grand River Geographic Initiative and is not part of the Remedial Investigation work currently being performed at the site.

RI/FS Phase I Report:
The Ohio EPA received the Phase I Remedial Investigation/Feasibility Study (RI/FS) report on May 6, 1998. The report, which was generated by the Painesville PRP Group, is currently under review by the Ohio EPA. Once the report is approved, copies will be placed in both the Painesville and Fairport document repositories.

Fire on Study Area 7:
On March 27, 1998, Painesville Township, Painesville City and other area fire departments responded to a grass fire on Study Area 7. Approximately two hundred acres of the four hundred fifty acre waste lake burned. Several firefighters sustained minor injuries during the blaze. The Ohio EPA does not believe that the firefighters were exposed to site contaminants; however, the agency will be utilizing data collected during Phase I of the Remedial Investigation to confirm this.

Development Plan for the Site:
The Ohio EPA and local politicians recently became aware of a proposal by a local developer to turn portions of the Diamond Shamrock Painesville Works Site into a residential/recreational/light industrial/commercial area. While this future end-use of the site may be feasible, it will not occur in the near future. Prior to the redevelopment of the property, both Phase I and Phase II investigatory activities must be completed at the site.

Q&A:
Q. I've heard that there are tank cars buried in the One Acre Landfill.....

A. There may be tank cars buried in this landfill; however, we don't know for sure. The "bottom line" is that it really doesn't matter if there are tank cars or a lot of drums containing waste in the landfill. No one is disputing the fact that large quantities of hazardous wastes were disposed of at this site. The issue is that wastes were disposed there, not what the wastes were put in prior to burial.

The landfill, which is located adjacent to Lake Erie, has been updated with a slurry wall, surface cap, leachate collection system and monitoring wells. To date, the monitoring wells do not indicate that any contaminants are leaking out of the landfill. Additional monitoring will be performed as part of the Remedial Investigation at the site. The Ohio EPA is currently working with Chemical Land Holdings to develop a temporary Operation and Maintenance Plan for monitoring and maintenance of the site until it can be determined how the landfill will be dealt with. The determination of the landfill's "future" will not be made until after the Remedial Investigation is complete. The public will have an opportunity to formally comment on any proposal put forth by the Oho EPA.

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